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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

v.

D-1 PRINCE CHARLES KNOWLES,
D-2 NYLE BAYETTE-DIA WILLIS,
D-3 JAMEL ANTHONY BROWN,
D-4 CHRISTIAN JAMIESON SMITH,

Defendants.

Violations:
18 U.S.C. § 371
18 U.S.C. § 922(a)(6)

Case: 2:24-cr-20557
Assigned To : Murphy, Stephen J., III
Referral Judge: Altman, Kimberly G.
Assign. Date : 10/1/2024
Description: SEALED MATTER (SS)

INDICTMENT

The Grand Jury charges:

COUNT ONE

*Conspiracy to Make a False Statement
During the Acquisition of a Firearm*
18 U.S.C. §§ 371, 922(a)(6)

D-1 PRINCE CHARLES KNOWLES
D-2 NYLE BATETTE-DIA WILLIS
D-3 JAMEL ANTHONY BROWN
D-4 CHRISTIAN JAMIESON SMITH

From on or about October 9, 2022, and continuing thereafter until
on or about November 29, 2022, in the Eastern District of Michigan and
elsewhere, the defendants, PRINCE CHARLES KNOWLES, NYLE
BAYETTE-DIA WILLIS, JAMEL ANTHONY BROWN, and CHRISTIAN

JAMIESON SMITH, knowingly and willfully conspired and agreed together with each other to submit false statements during the acquisition of a firearm, in violation of Title 18, United States Code, Section 922(a)(6).

The object of the conspiracy was for WILLIS, BROWN, and SMITH to purchase firearms online through federally licensed firearms dealers on behalf of KNOWLES. WILLIS, BROWN, and SMITH would then go to Motor City Pawn Brokers, a federally licensed firearm dealer located in the Eastern District of Michigan, obtain the firearms, and transfer the firearms to KNOWLES.

In furtherance of the conspiracy and to accomplish its object and purpose, KNOWLES, WILLIS, BROWN, and SMITH committed, or caused to be committed, the following overt acts, among others, in the Eastern District of Michigan and elsewhere:

Purchase of Firearms by WILLIS for KNOWLES

- a. On or about October 9, 2022, WILLIS ordered an FN, M249S, 5.56 caliber belt fed rifle, serial number: M249SA05910 from the Modern Sportsman, through his gunbroker.com account: KingLwill.
- b. On October 10, 2022, KNOWLES texted WILLIS asking if he had received a confirmation email from the seller.

- c. On or about October 9, 2022, through October 14, 2022, WILLIS obtained \$10,375 in postal money orders, using money given to him by KNOWLES.
- d. On October 12, 2022, KNOWLES texted WILLIS instructing him to take pictures of the money orders.
- e. On October 13, 2022, KNOWLES and WILLIS discussed purchasing another firearm via text.
- f. On or about October 14, 2022, WILLIS paid for the previously ordered FN rifle with the money orders.
- g. On October 17, 2022, WILLIS sent KNOWLES a picture of the tracking information for the FN rifle.
- h. On October 18, 2022, WILLIS texted KNOWLES asking when they would be meeting to pick up the FN rifle. KNOWLES informed WILLIS that the FN Rifle was at the firearms dealer and told WILLIS to take a shower before they went so he did not smell like marijuana.
- i. On October 18, 2022, WILLIS met up with KNOWLES outside Center Mass Inc., a federally licensed firearms dealer in Livonia, Michigan. WILLIS entered into Center Mass Inc. and completed ATF Form 4473 attesting that he was the transferee/buyer of the FN rifle.
- j. On October 18, 2022, WILLIS gave KNOWLES the rifle and KNOWLES paid WILLIS \$1,000.
- k. On October 22, 2022, KNOWLES texted WILLIS asking for his login for gunbroker.com. WILLIS responded by giving his username and password.
- l. On November 11, 2022, KNOWLES texted WILLIS telling him he was going to purchase another FN Rifle. WILLIS responded that KNOWLES had his login information and

could order it himself. KNOWLES asked WILLIS to confirm additional information so he could order the FN Rifle in WILLIS's name.

- m. On November 12, 2022, KNOWLES used WILLIS's gunbroker.com login information to order an FN, M249S, 5.56 caliber belt fed rifle, serial number: M249SA05945, from Caroline Colt Company, a federally licensed firearms dealer in Abilene, Texas.
- n. On or about November 12 through November 13, 2022, KNOWLES obtained \$10,163.93 in money orders. KNOWLES texted WILLIS to meet up so WILLIS could send the money orders to pay for the new FN Rifle.
- o. On November 14, 2022, KNOWLES texted WILLIS repeatedly to meet with him so WILLIS could fill out and send the money orders. KNOWLES instructed WILLIS that he needed to sign the fronts and the backs of the money orders before sending them off.
- p. On or about November 15, 2022, WILLIS sent the money orders to Caroline Colt Company in Abilene, Texas, to pay for the FN Rifle. KNOWLES instructed WILLIS to call the company and let them know payment had been sent.
- q. On November 18, 2022, KNOWLES called Motor City Pawn Broker, a federally licensed firearms dealer in Ferndale, Michigan to see when the FN Rifle would arrive. He then instructed WILLIS not to call them.
- r. Between November 18, 2022, and November 29, 2022, KNOWLES and WILLIS communicated by text message to set up the date and time WILLIS could transfer the FN Rifle. KNOWLES repeatedly asked WILLIS to check the tracking information for the FN Rifle.

- s. On November 24, 2022, WILLIS texted KNOWLES that the FN Rifle had arrived and sent him a screenshot including a picture of the FN rifle indicating the shipment was complete.
- t. On November 29, 2022, KNOWLES and WILLIS met up with another individual and drove to Motor City Pawn Broker. KNOWLES had \$2,000 in cash to pay WILLIS for the FN Rifle.
- u. On November 29, 2022, WILLIS entered into Motor City Pawn Broker and filled out ATF Form 4473 attesting that he was the transferee/buyer of the FN Rifle.

Purchase of Firearms by BROWN for KNOWLES

- a. On October 12, 2022, BROWN ordered an FN, M249S, 5.56 caliber belt fed rifle, serial number: M249SA05974 from Tanners Sports Center, a federally licensed firearms dealer in Jamison, Pennsylvania.
- b. During the purchase of the FN rifle, BROWN supplied his phone number and email address. Both the phone number and the email address which BROWN provided belonged to KNOWLES.
- c. Between October 12, 2022, and October 19, 2022, BROWN obtained \$10,030 in USPS money orders and sent them to Tanners Sports Center for the FN rifle.
- d. On October 22, 2022, BROWN went to Motor City Pawn Broker, a federally licensed firearms dealer in Ferndale, Michigan and filled out ATF Form 4473 attesting that he was the transferee/buyer of the FN Rifle. BROWN then obtained the rifle from Motor City Pawn Brokers.

Purchase of Firearms by SMITH for KNOWLES

- a. On an unknown date, SMITH gave KNOWLES his email address and cell phone number to use to purchase a firearm.
- b. On an unknown date, KNOWLES purchased an FN, M249S, 5.56 caliber belt fed rifle, serial number: M249SA01938 from a private seller in Guyton, Georgia through gunbroker.com.
- c. On an unknown date, KNOWLES obtained money orders to send to the private seller to purchase the FN rifle.
- d. On October 29, 2022, SMITH went to Motor City Pawn Brokers, a federally licensed firearms dealer in Ferndale, Michigan and filled out ATF Form 4473 attesting that he was the transferee/buyer of the FN Rifle. SMITH then obtained the rifle from Motor City Pawn Brokers. SMITH used KNOWLES's cell phone number to fill out the form.
- e. On October 29, 2022, SMITH took the FN rifle and met with KNOWLES at a nearby restaurant and gave KNOWLES the rifle.
- f. KNOWLES paid SMITH \$500 in cash to purchase the rifle.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
18 U.S.C. § 922(a)(6)
False Statement During Purchase of a Firearm

D-2 NYLE BATETTE-DIA WILLIS

On or about October 18, 2022, in the Eastern District of Michigan, Southern Division, NYLE BAYETTE-DIA WILLIS, in connection with the acquisition of an FN, M249S, 5.56 caliber belt fed rifle, serial number:

M249SA05910, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements, which statements were intended to deceive and were likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did falsely execute Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transactions Records, in which he claimed to be the actual purchaser of the above listed firearm, when in fact another individual was the actual transferee/buyer of the firearm. All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE
18 U.S.C. § 922(a)(6)
False Statement During Purchase of a Firearm

D-2 NYLE BATETTE-DIA WILLIS

On or about November 29, 2022, in the Eastern District of Michigan, Southern Division, NYLE BAYETTE-DIA WILLIS, in connection with the acquisition of an FN, M249S, 5.56 caliber belt fed rifle, serial number: M249SA05945, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did

knowingly make false and fictitious written statements, and attempted to do so,, which statements were intended to deceive and were likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did falsely execute Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transactions Records, in which he claimed to be the actual purchaser of the above listed firearm, when in fact another individual was the actual transferee/buyer of the firearm. All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FOUR

18 U.S.C. § 922(a)(6)

False Statement During Purchase of a Firearm

D-3 JAMEL ANTHONY BROWN

On or about October 22, 2022, in the Eastern District of Michigan, Southern Division, JAMEL ANTHONY BROWN, in connection with the acquisition of an FN, M249S, 5.56 caliber belt fed rifle, serial number: M249SA05974, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements, which statements were intended to deceive

and were likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did falsely execute Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transactions Records, in which he claimed to be the actual purchaser of the above listed firearm, when in fact another individual was the actual transferee/buyer of the firearm. All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FIVE
18 U.S.C. § 922(a)(6)
False Statement During Purchase of a Firearm

D-4 CHRISTIAN JAMIESON SMITH

On or about October 29, 2022, in the Eastern District of Michigan, Southern Division, CHRISTIAN JAMIESON SMITH, in connection with the acquisition of an FN, M249S, 5.56 caliber belt fed rifle, serial number: M249SA01938, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements, which statements were intended to deceive and were likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under chapter 44

of Title 18, in that the defendant did falsely execute Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transactions Records, in which he claimed to be the actual purchaser of the above listed firearm, when in fact another individual was the actual transferee/buyer of the firearm. All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATION

The allegations contained in Counts One through Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture under Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c). Under Title 18, United States Code, Section 924(d)(1) together with Title 28, United States Code, Section 2461(c), upon conviction of the offenses in violation of Title 18, United States Code, Section 371 and Title 18, United States Code, Section 922(a)(6) set forth in Counts One through Five of this Indictment, the defendants, shall forfeit to the United States of America, any firearm or ammunition involved in or used in any knowing

violation of the offenses, including, but not limited to: FN, M249S, 5.56 caliber belt fed rifles, serial numbers: M249SA05910, M249SA05945, M249SA05974, and M249SA01938.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

s/ Sara D. Woodward
SARA D. WOODWARD
Chief, General Crimes Unit
Assistant United States Attorney

s/ Micah S. Wallace
MICAH S. WALLACE
Assistant United States Attorney

Dated: October 1, 2024

United States District Court Eastern District of Michigan	Criminal Case
NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to	
Case: 2:24-cr-20557 Assigned To : Murphy, Stephen J., III Referral Judge: Altman, Kimberly G. Assign. Date : 10/1/2024 Description: SEALED MATTER (SS)	
Companion Case Information This may be a companion case based upon LCrR 57.10 (b)(4) ¹ : <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Companion Case Number: Judge Assigned: AUSA's Initials: <i>BSJ</i>	

Case Title: USA v. Prince Knowles, Nyle Willis, Jamel Brown, Christian Smith

County where offense occurred : Wayne and elsewhere

Indictment/ Information --- no prior complaint.
 Indictment/ Information --- based upon prior complaint [Case number:]
 Indictment/ Information --- based upon LCrR 57.10 (d) [*Complete Superseding section below*].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- Corrects errors; no additional charges or defendants.
 - Involves, for plea purposes, different charges or adds counts.
 - Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 1, 2024

Date

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.